

UNION PLANTERS CORPORATION
COMMITTEE ON GOVERNMENT AFFAIRS
P.O. BOX 387
MEMPHIS, TN 38147

APR 23 12 03 PM '97

April 15, 1997

Mr. Neil Evans
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00044024

Reference: 30 Day Post-General Report (10-17-96/11-25-96)

Dear Mr. Evans:

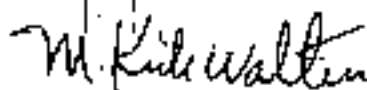
The discrepancy referred to on Schedule A Line 12 results from our combining two separate checks received from the Leader Federal Savings PAC (one check for \$14,875.12 from Leader's Federal PAC-- which was reported to you on Leader's Federal PAC report--and a second check for \$16,214.23 from Leader's State PAC). Both of these we considered transfers from Affiliated Committees since, upon Union Planters Corporation's acquisition of Leader Federal, Leader's committees became affiliated with Union Planters. The PACs were merged as were the two sponsoring companies (Union Planters and Leader). Attached hereto is a revised Schedule A listing each check separately.

Our accountant discussed with your office approximately two years ago the fact that we were combining Union Planters Corporation's two PAC accounts (one Federal and one State/Local) into one account. A representative of your office concurred with our accountant that this would be permissible as long as our future reports included all activity. This is what we have done. The \$16,214.23 received from the Leader State PAC has subsequently all been contributed to State/Local candidates and not to Federal candidates. Generally speaking, none of our contributions received from our officers and employees are designated between Federal and State/Local so we always report 100% of the contributions. This particular receipt did come from a State/Local PAC. We cannot tell whether the contributors had actually designated the contributions as State/Local or not. However, we have used the transferred amount for State/Local candidates.

I hope this satisfactorily resolves the issue. If not, please advise and we can do something differently.

Thank you for your continuing helpfulness to our Committee.

Sincerely,



M. Kirk Walters
Treasurer

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 12

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

UNION PLANTERS COMMITTEE ON GOVERNMENT AFFAIRS PAC ID#1167

A. Full Name, Mailing Address and ZIP Code Transfer from Leader Federal Bank for Savings Political Action Committee Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Transfer due to merger with Union Planters Corporation Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 10-9-96	Amount of Each Receipt this Period 14,875.12
B. Full Name, Mailing Address and ZIP Code Transfer from Mid South Tennessee Committee on Government Affairs (Part of Leader Federal Bank for Savings) effective 10-1-96 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Transfer to Union Planters Corporation due to merger Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 10-10-96	Amount of Each Receipt this Period 16,214.23
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional) \$31,089.35

TOTAL This Period (last page this line number only)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Milt Kirkland Walters, Treasurer
Union Planters Corporation Committee
On Government Affairs
7130 Goodlett Farms Parkway
Cordova, TN 38018

APR 9 1997

Identification Number: C00044024

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Mr. Walters:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

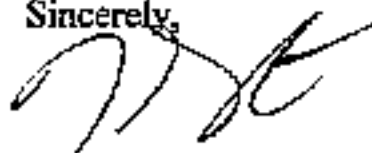
-Schedule A for Line 12 discloses a transfer from the Leader Federal Savings PAC of \$31,089.35. However, Leader Federal Bank for Savings Political Action Committee discloses only a \$14,875.12 transfer to Union Planters Committee on Government Affairs. Please clarify this \$16,214.23 discrepancy.

If the discrepancy is the result of the receipt of nonfederal funds into the federal account, be advised that this is impermissible. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution, the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in black ink, appearing to read 'NEVANS', written over the word 'Sincerely,'.

Neil Evans
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Union Planters Corporation Committee on Government Affairs PAC ID#1167

A. Full Name, Mailing Address and ZIP Code Transfer from Leader Federal Savings PAC upon Merger with UNION Planters' Bank.	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	10/17/96	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

\$31,089.35

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 32

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Leader Federal Bank for Savings Political Action Committee

MS

A. Full Name, Mailing Address and ZIP Code Union Planters Committee on Government Affairs	Purpose of Disbursement Transfer of remaining funds to Union Planters PAC due to merger Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/9/96	Amount of Each Disbursement This Period 14,875.12
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$14,875.12

TOTAL This Period (last page this line number only)

\$14,875.12

**Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered DATE OF RECEIPT

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Registered/Certified Mail POSTMARKED
4-15-97

No Postmark

Postmark Illegible

Received from the House Office of Records and Registration DATE OF RECEIPT

Received from the Senate Office of Public Records DATE OF RECEIPT

Other (Specify): POSTMARKED
and/or DATE OF RECEIPT

JES 4-24-97
PREPARED DATE PREPARED